

COPY

LAURIE ORTOLANO

V.

CITY OF NASHUA

Docket No. 1:22-CV-00236-LM

KIMBERLY KLEINER

May 09, 2024



AVICORE REPORTING

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	25		27
1	speak with residents with large multiple	1	that this is directed to. The April 8th.
2	requests on properties not owned by the	2	A Yes, and there could be others.
3	individual. Please write down any questions and	3	Q Okay. Do you recall whether there were others?
4	they'll be answered in writing.	4	A Yes. There were others.
5	Q That's enough. I'm sorry.	5	Q Okay. Do you know how many?
6	So in the first document that we just	6	A No.
7	looked at in this packet, it specifically	7	Q Okay. On to the third page of this packet
8	mentions Ms. Ortolano, correct?	8	labeled Friday, July 19th, 2019, and this one is
9	MS. FEENEY: I just want a clear record.	9	number 2, and if you could just read the
10	MR. OLSON: Sure.	10	beginning where it says send copies to Karina?
11	MS. FEENEY: This is the April 1, 2019,	11	A Send copies to Karina - sign-in sheets, property
12	first page of Exhibit 2?	12	cards requested, Assesshelp questions regarding
13	MR. OLSON: That's correct. Yes.	13	assessments will be forwarded to me. If an
14	MS. FEENEY: Okay. Because you've got	14	assessor needs to answer we will discuss on
15	exhibit numbers on these other pages that --	15	Mondays and share with Legal.
16	MR. OLSON: Yes.	16	Q And correct me if I'm wrong, you had a chance to
17	MS. FEENEY: Okay. Sorry I probably mucked	17	read through all the pages, right?
18	up -- I'm sorry.	18	A Yes.
19	A I don't remember the question now.	19	Q Do any of the other, the first two documents,
20	Q No problem. In the first document we looked at	20	mention sharing with Legal or is this the first
21	in this packet that was labeled Monday, April	21	time?
22	1st, 2019, it mentions Ms. Ortolano	22	A This was the first.
23	specifically, correct?	23	Q Do you know what would have spurred that change?
	26		28
1	A Yes, it does.	1	A At some point, I do not know the exact date,
2	Q And the second document which is labeled Monday,	2	there was instructions that Right-to-Know
3	April 8th, 2019, basically the same message but	3	requests would be sent to the Legal office.
4	her name is not mentioned, correct?	4	Q And do you know from whom those instructions
5	A No. I don't agree it's the same message.	5	came?
6	Q Okay. And why not?	6	A From the Legal office. I don't know exactly
7	A The first is specifically any questions that	7	how.
8	need to be answered by Assessors. The second is	8	Q Okay. Would you have a regular point of contact
9	residents that have large multiple requests on	9	within the Legal Department?
10	properties that are not their own. So that	10	A Yes. I mean, about, depends about what. I
11	generally entails a lot more information to be	11	mean --
12	gathered.	12	Q So I guess about Assessing.
13	Q Okay.	13	A Yes. I would commonly speak with either
14	A So I don't consider that the same thing.	14	Attorney Bolton or Attorney Leonard.
15	Q Would you agree with me that the Monday, April	15	Q All right. Anybody else in the Legal office or
16	8th, agenda does not include Laurie Ortolano's	16	just one of those two?
17	name?	17	A Pinpoint Assessing?
18	A It does not.	18	Q Yes.
19	Q Was Laurie Ortolano one of those people who	19	A One of those two.
20	would typically appear with large multiple	20	Q Okay. Thank you. So back to the mandatory
21	requests on properties not owned by her?	21	audit. I'm sorry I'm jumping around a little
22	A Yes.	22	bit.
23	Q So she could be identified as one of the people	23	Who was the Chief Assessor if you recall

	53		55
1	MS. FEENEY: You mean summarize Exhibit 5?	1	May informing them to direct Ms. Ortolano's
2	Q Summarize the first paragraph.	2	questions to her.
3	MS. FEENEY: I'm going to object to the	3	Q So at that point, was Louise Brown instructed
4	form.	4	not to turn over documents to Ms. Ortolano?
5	Q Okay, sure. That's fine.	5	MR. CULLEN: Objection to form.
6	MS. FEENEY: Having her summarize something	6	MS. FEENEY: I'm going to give you a
7	that's written by her doesn't seem to make	7	continuing objection to form on this exhibit.
8	sense, but it's your deposition.	8	A So at this point, this is September of 2019.
9	Q Can you give me a brief summary of what the	9	Prior would stand. So the July, the April and
10	first paragraph says?	10	July direction had not changed in that point.
11	MS. FEENEY: Again, I'll object to your	11	So if Ms. Brown informed administrative staff to
12	form. You may answer.	12	direct Ms. Ortolano's questions to her, that
13	A Okay. In the first paragraph, I am speaking to	13	would be in form with the previous directions
14	the fact that Ms. Ortolano had come to my office	14	that had been given.
15	looking for information that was on Cheryl	15	Q Okay. So not just to Louise Brown, but I
16	Walley's desk, and I, she claims were violating	16	believe those documents that you're referring to
17	her rights, not giving her the document, and I	17	from April and July --
18	informed her that Legal was on the third floor.	18	A Correct.
19	Q And at that time, was everything referred to	19	Q -- said that the requests would then go to
20	Legal on the third floor regarding Ms.	20	legal, correct?
21	Ortolano's request?	21	A Correct. So to be clear, Ms. Brown is the
22	A Regarding Right-to-Know requests, everything was	22	Administrative Services Supervisor so she's
23	being directed through us, we would take the	23	directing her two clerks to give the questions
	54		56
1	request, and everything was being directed to	1	to her. Okay?
2	the legal department. In this particular, the	2	Q Okay. But then eventually they go to Legal,
3	last sentence explains, she was asking for	3	correct?
4	information that I considered a personnel matter	4	A Yes. I mean, depending on if it's a
5	which would not be discussed with a resident	5	Right-to-Know request, depending on what it's
6	which is why I asked her to go to Legal. I was	6	for, I mean if it's -- it depends, it depends on
7	not going to give her the information.	7	what it is.
8	Q Okay. Would it be fair to say that in that	8	Q So just to be clear, would Ms. Ortolano be able
9	first paragraph Ms. Ortolano is looking for a	9	to obtain access to any records in assessing
10	document?	10	without it going through Louise Brown?
11	MS. FEENEY: I'm going to again object to	11	MS. FEENEY: At what point in time?
12	your form.	12	Q In 2019. Starting in May of 2019.
13	Q Okay. I'll ask the witness to read the 1, 2, 3,	13	A Yes. I believe she did. I believe she looked
14	fourth line down beginning with the sentence on	14	up property record files. I believe she looked
15	the right-hand side that says she then. Do you	15	at many things if they were readily available.
16	see that? Fourth line down?	16	Q But certain requests were to be referred first
17	A She then claims we are violating her rights.	17	to Louise Brown and then to you or Mr. Griffin,
18	Q I believe you might have skipped over a line.	18	correct?
19	She then informs?	19	A Yes. If there were multiple requests or if they
20	A Oh. She then informs me she needs a document	20	were requests for things that needed to be
21	off Cheryl Walley's desk in a stack on the	21	investigated and researched and found.
22	right-hand side of the desk. She claims Ms.	22	Q Okay. Thank you. So at some point again, this
23	Brown had a meeting with administrative staff in	23	would be around the same time that you wrote

<p style="text-align: right;">61</p> <p>1 Q Okay. At some point did the attitude of the 2 people in assessing both administrative staff 3 and Assessors change with respect to Ms. 4 Ortolano?</p> <p>5 MS. FEENEY: I'll object to your form. You 6 may answer.</p> <p>7 A I'm not sure I understand the question.</p> <p>8 Q Okay. I'll rephrase.</p> <p>9 Originally, admin staff in Assessing and 10 the Assessors would have outreach to Ms. 11 Ortolano. They respond to her questions. At 12 some point did that relationship sour because of 13 the excessive requests by Ms. Ortolano as 14 reflected in that newspaper article?</p> <p>15 MS. FEENEY: I'm going to object to your 16 form, and tell the witness she may answer.</p> <p>17 A So I don't think I can certainly speak for the 18 individuals themselves, but there was a 19 significant amount of frustration on staff being 20 overwhelmed with the amount of work in front of 21 them, and that was apparent to me.</p> <p>22 Q What was your attitude?</p> <p>23 A I think we were all significantly trying to help</p>	<p style="text-align: right;">63</p> <p>1 Assessors did not want to have contact with you 2 anymore. Can you recall that?</p> <p>3 MR. CULLEN: Objection to form.</p> <p>4 MS. FEENEY: Object to form.</p> <p>5 A With me?</p> <p>6 Q Yes.</p> <p>7 MS. FEENEY: Your question was that the 8 Assessors didn't want to have contact with my 9 client?</p> <p>10 Q No. I'm sorry, the Assessors did not want to 11 have contact with Laurie Ortolano.</p> <p>12 MS. FEENEY: That's not what your question 13 was. Let's just do it over and get it right.</p> <p>14 Q Do you recall at some point that the Assessors 15 came to you and told you that they did not want 16 to have contact with Laurie Ortolano anymore?</p> <p>17 A Yes.</p> <p>18 Q Thank you. Do you remember what spurred that?</p> <p>19 A Yes.</p> <p>20 Q What was it?</p> <p>21 A There had been a number of ethics violations 22 filed with the Department of Revenue on various 23 Assessors by Ms. Ortolano.</p>
<p style="text-align: right;">62</p> <p>1 the best we could, but we were under a 2 significant amount of pressure to complete the 3 work, including the Right-to-Know requests.</p> <p>4 Q Did you feel that Ms. Ortolano had ill feelings 5 toward you or anyone in the Assessing Office?</p> <p>6 A Yes. I did. I think they were publicly said at 7 Board of Aldermen meetings. Yes. (Exhibit 7 marked for identification)</p> <p>8 Q You recognize this document?</p> <p>9 A Yes.</p> <p>10 Q Can you just read it for me, please?</p> <p>11 A The email is from Laurie Ortolano to me. Kim, 12 thanks so much for some of your time. I dropped 13 in unscheduled and really appreciate you taking 14 the time to speak with me. Your efforts have 15 not gone unnoticed. This was and is a big task 16 and I know you're working to move the city in 17 the right direction. The Mayor is lucky to have 18 you. Laurie.</p> <p>19 Q Do you recall seeing that?</p> <p>20 A I do.</p> <p>21 Q In '19. Thank you. So at some point, I believe 22 this was early in 2020 you announced that the</p>	<p style="text-align: right;">64</p> <p>1 Q Do you recall specifically which members of the 2 Assessing Department were involved?</p> <p>3 A Had violations?</p> <p>4 Q Yes.</p> <p>5 A So Greg Turgiss and Gary Turgiss. I'm not sure 6 on Mike Mandile. Both the Turgisses.</p> <p>7 Q So Ms. Ortolano filed ethics violations or filed 8 something with the State or the Department of 9 Revenue about both Turgisses?</p> <p>10 A Yes.</p> <p>11 Q Okay. Anybody else that you recall?</p> <p>12 A I believe there was another resident who did 13 file complaints as well.</p> <p>14 Q Okay. And do you recall who that was?</p> <p>15 A Ms. Laura Colquhoun.</p> <p>16 MS. FEENEY: Kurt, just before you get into 17 the questions, Exhibit 8, does the enclosure 18 letter which cites a list of things enclosed, 19 are all of those attached to this exhibit?</p> <p>20 MR. OLSON: They are not.</p> <p>21 MS. FEENEY: So Exhibit 8 is a January 23, 22 2020, letter to Attorney Lehmann, but all the 23 itemized enclosures are not attached to Exhibit</p>

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1	8.	1	their contact with Laurie Ortolano.
2	MR. OLSON: That's correct.	2	Q And after the Lynn Cameron incident happened,
3	MS. FEENEY: Okay. Thanks.	3	did you have discussion with all of them about
4	Q You can certainly continue reading to reach the	4	how that's what they wanted, not to have contact
5	end, but I just have a question about one	5	with Laurie Ortolano?
6	paragraph in the document.	6	A I'm not sure that I had a conversation with
7	MS. FEENEY: Finish.	7	Mr. Dane, but I believe he was present when they
8	Q Actually, it's that page that I'm interested in	8	spoke with Detective Lombardi. I was not.
9	so in the middle of the page do you see where it	9	Q You weren't. Okay.
10	says I informed Ortolano as a result of this	10	A I was not.
11	incident?	11	Q But you had previously told, because your name
12	A Yes.	12	is one of the ones listed here, you had
13	Q And it goes on to say that after, I believe this	13	previously told Detective Lombardi that that was
14	was Detective Lombardi, after Detective Lombardi	14	your desire as well?
15	finished speaking with the members of the	15	A I must have. I mean, I don't remember
16	Assessing Department, none of them wanted to	16	specifically saying I didn't want to have
17	have contact with Ms. Ortolano; is that correct?	17	contact. I commonly would have contact as the
18	A Yes.	18	Director of the department.
19	Q And did each of the people who are listed here,	19	Q Okay. Thank you.
20	Michael Mandile, Kimberly Kleiner, yourself,	20	MS. FEENEY: Can you just give me a second?
21	Louise Brown, Greg Turgiss, Gary Turgiss,	21	(Discussion off the record)
22	Douglas Dane, Lynn Cameron, Amanda Mazerolle,	22	(Exhibit 9 marked for identification)
23	did they come to you individually before they	23	MS. FEENEY: This whole exhibit or is this
	66		68
1	spoke with Detective Lombardi?	1	one of those blendos?
2	A So at different times. At different times the	2	Q This one is, the first probably 7 or 8 pages are
3	individuals came to me. This was a result of	3	the letters to the individuals, Duhamel,
4	the Lynn Cameron meeting in the parking lot.	4	Turgiss, and Tozer and then about midway through
5	One of the exhibits you gave me just a few	5	is the letter from the State Department of
6	minutes ago where Lynn came to my office visibly	6	Revenue which includes their discipline. That's
7	shaken. So Lynn and Louise came to me right	7	where the DRA starts.
8	before they contacted the police department.	8	MS. FEENEY: Yes.
9	Q I think what you're recounting is, and Detective	9	Q I think we've talked, Ms. Kleiner, about a
10	Lombardi says the same thing, that these members	10	couple of different members of the Assessing
11	of the Assessing Department came to you as a	11	Department getting sanctioned, correct?
12	result of the incident with Lynn Cameron,	12	A Yes.
13	correct?	13	Q And do you remember based on looking at this
14	A Correct.	14	document who was sanctioned by both New
15	Q But you said earlier that they came to you at	15	Hampshire Association of Assessing Officials and
16	different times. So you didn't hear from all of	16	by the New Hampshire Department of Revenue
17	them in the same day that the Lynn Cameron	17	Administration?
18	incident happened?	18	A I think there's a mixture in here.
19	A Not within the same meeting. They all came to	19	MS. FEENEY: That's what I just saying to
20	me at different times that day, several days	20	him before. There's a whole bunch of stuff in
21	before that. So this was not, this was not the	21	Exhibit 9.
22	first time that they had approached me asking me	22	A Right and there's --
23	if something could be done about them limiting	23	MS. FEENEY: So just listen to the question

	93		95
1	Laurie Wilshire, the President of the Board of	1	corner, and at the bottom of the page it's your,
2	Aldermen, copying the Mayor, and second and	2	I guess you call it testimony to the members of
3	third page are an email that was written by	3	the Board; is that accurate?
4	Raymond Feoli, President of Inception to the	4	MS. FEENEY: I'm going to object to your
5	Board of Aldermen.	5	form as to testimony.
6	Q And can you briefly describe what this was	6	Q Do you know what you were addressing the Board
7	about?	7	on that day?
8	A Briefly, Inception Technologies was working with	8	A So I'm giving the Board an update on the project
9	us on a scanning project scanning all of the	9	and so I go on to explain the project, where it
10	records in Assessing, primarily property	10	currently is, and that I end with the document
11	records. This was a project that had occurred,	11	that is addressed to them from Mr. Feoli.
12	started during COVID. It was taking a long	12	That's it.
13	time. I was going to provide the Board of	13	Q The paragraph that begins, this is on page 4,
14	Aldermen with an update on the project that had	14	upper right-hand corner, and you are speaking,
15	been impacted by COVID and answer their	15	sorry, let me know if you are speaking where you
16	questions as to why Mr. Feoli the need to send	16	say last week Chief Vincent. Is that still your
17	this email.	17	words to the Board?
18	Q How would you describe the email that Mr. Feoli	18	A Yes.
19	sent to you? In other words, what was it about?	19	Q Okay. Can you just read that for us?
20	What was the content?	20	A Sure. Last week Chief Vincent and I received
21	A I think Mr. Feoli is simply letting his client	21	several emails on the project from a resident
22	know, the City, that he was concerned, he had a	22	who also --
23	conversation with someone whom he thought was a	23	Q Probably copied?
	94		96
1	City employee and later found out it was not,	1	A -- supposed to be copied the State DRA,
2	and he was concerned that he may have given more	2	Department of Revenue Administration, and the
3	information than was their standard procedure to	3	Nashua Police Department. Information and
4	do.	4	misinformation in those emails caused me to
5	Q Okay. Is it your understanding that Mr. Feoli	5	reach out to the vendor. During our
6	was referring to Laurie Ortolano?	6	conversation with Ray Feoli, President of
7	A Yes.	7	Inception Technologies, informed me that a city
8	Q Okay. And at some point did you inform	8	employee named Ms. Ortolano had also reached out
9	Mr. Feoli that Ms. Ortolano was not a City	9	to him regarding the project and indicated that
10	employee?	10	she could expedite payment on the remaining
11	A Yes. In a phone call.	11	project. I informed Mr. Feoli that she was not
12	Q And I'll show you the next exhibit.	12	employed by the city and for many reasons which
13	(Exhibit 17 marked for identification)	13	was concerning to him. I informed him that I
14	Q You don't have to read the entire document if	14	would update the Board of the project,
15	you don't want to. What I'm interested in is on	15	especially with a quote going to Finance. He
16	page 3 in this document which actually if you	16	indicated that he would be happy to speak with
17	could identify it for us that would be great.	17	you should you request he do so.
18	Do you know what this document is?	18	Q So in the conversation that you reference here
19	A These are, yes, these are minutes from the Board	19	with Mr. Feoli, had you already told him that
20	of Aldermen meeting held Tuesday, February 8th,	20	Ms. Ortolano was not a City employee?
21	2022.	21	A Yes.
22	Q So on to the page, page 3, it's actually	22	Q Okay. And why did you decide to report this to
23	identified that way in the upper right-hand	23	the Board of Aldermen?

	97		99
1 A	Because Mr. Feoli sent me an email that is	1 A	Yes.
2	addressed to the Board of Aldermen, and I felt	2 Q	And in Exhibit 2, your decision. I believe you
3	obligated to deliver.	3	wrote those agendas, right?
4 Q	Okay. Thank you.	4 A	Yes. I did.
5	So the last series of questions for you	5 Q	So in Exhibit 2, what you do is direct the
6	concern these last two documents.	6	Assessors not to even speak with Ms. Ortolano,
7	(Exhibit 18 marked for identification)	7	correct?
8	(Laurie Ortolano enters deposition by Zoom)	8	MR. CULLEN: Objection to form.
9 Q	All set?	9	MS. FEENEY: I'll join that objection. You
10 A	Yes. I mean I haven't read it word for word.	10	can answer.
11	MS. FEENEY: Let's wait for the question,	11 A	So I do acknowledge that they would not like to
12	and then if you need more time to read it we can	12	speak with her and to write down the questions
13	take a moment.	13	and they will be answered. Yes. So I believe
14 Q	I actually am just going to be referring you to	14	the resident is getting the information although
15	one small section so it's probably best you	15	it may not directly be coming out verbally from
16	don't read the whole thing. If you would turn	16	those Assessors' mouths at that precise moment.
17	to page 2 of the document?	17 Q	So I guess I'd just like to clarify because I
18 A	Okay.	18	believe you said that the Assessors going
19 Q	So we referenced this particular provision of	19	forward, Mike, Gary, and Greg, three Assessors,
20	the Canon of Ethics earlier. ER 1-4. That's in	20	right? I think you said would not like to speak
21	the middle of the page there. And could you	21	with Ms. Ortolano. This is actually a directive
22	read that for us, please? Just that paragraph?	22	from you, right?
23 A	ER 1-4, Members must make available all public	23 A	Yes.
	98		100
1	records in their custody for public review,	1 Q	And those three will not speak to Ms. Ortolano.
2	unless access to such records is specifically	2	MS. FEENEY: I don't understand your
3	limited or prohibited by law, or the information	3	question. If you could try again.
4	has been obtained on a confidential basis and	4	MR. OLSON: I just wanted to clarify
5	the law permits such information to be treated	5	because --
6	confidentially.	6	MS. FEENEY: I understand. Go ahead.
7 Q	Okay. And if we go back to Exhibit 2, the one	7 Q	What you said was that going forward Mike, Gary
8	that had the agendas, beginning on April 1st,	8	and Greg would not like to speak to Ms.
9	2019? And then there's another one from April	9	Ortolano. Correct?
10	8. Looks like that.	10	MS. FEENEY: I'm going to object to your
11	MS. FEENEY: Exhibit 2?	11	form. Testimony will speak for itself.
12 Q	Yes. That's it.	12 Q	Okay. But what the document actually says is
13	MS. FEENEY: And what was the other one	13	going forward Mike, Gary, and Greg will not
14	you'd like?	14	speak with Ms. Ortolano?
15 Q	That's it.	15 A	That is what the document says.
16	MS. FEENEY: I'm sorry. I missed the	16 Q	And that was a directive from you, correct?
17	question in all of that.	17 A	Yes.
18	MR. OLSON: I didn't actually ask one yet.	18 Q	Okay. So under those circumstances, are you
19	MS. FEENEY: Good.	19	telling the Assessors, Mike, Greg, and Gary, to
20 Q	If you look at ER 1-4, talks about the	20	violate that ethical provision, ER 1-4?
21	obligation of Assessors to make documents,	21 A	No. I don't believe I am.
22	public documents available to citizens,	22 Q	Okay.
23	taxpayers, correct?	23 A	I believe I'm protecting my employees.

<p style="text-align: right;">101</p> <p>1 Q Okay. But the ethical rule basically sets forth 2 the duty of Assessors to turn over public 3 documents to taxpayers, correct?</p> <p>4 MR. CULLEN: Objection to form.</p> <p>5 MS. FEENEY: Same objection to form. You 6 may answer.</p> <p>7 A This is speaking to, this is providing public 8 records. I do not believe that ER 1-4 requires 9 them to answer verbally every question that is 10 raised. I believe the residents, yes, deserve 11 an answer. That doesn't necessarily mean that 12 it needs to be stated verbally right at that 13 moment. It does require them to make sure that 14 the residents get the information and public 15 records in accordance with RSA 91-A.</p> <p>16 Q So 91-A basically says that if there is a 17 document that's a public document that's 18 available in the Assessors Office, it must be 19 turned over at that time. Correct?</p> <p>20 MR. CULLEN: Objection to form.</p> <p>21 MS. FEENEY: Object to the form. If you 22 want to show her the statute, I'm happy to have 23 her look at the statute.</p>	<p>1 available for trial, I'll have no questions.</p> <p>2 MR. CULLEN: I have one quick question. I 3 apologize.</p> <p>4 EXAMINATION</p> <p>5 BY MR. CULLEN:</p> <p>6 Q At the beginning of your deposition, 7 Ms. Kleiner, you were asked some questions about 8 the concerns the staff had raised regarding Ms. 9 Ortolano misconstruing things that they said. 10 Was there also a concern expressed to you that 11 Ms. Ortolano might be mischaracterizing things 12 that they had said to her?</p> <p>13 A Yes.</p> <p>14 Q That's all I have.</p> <p>15 (Deposition ended at 1:30 p.m.)</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>
<p style="text-align: right;">102</p> <p>1 Q Let me go back to ER 1-4. You'll agree with me 2 that it says members must make available all 3 public records in their custody for public 4 review, correct?</p> <p>5 A That is what is stated there.</p> <p>6 Q Okay. So when you instructed the Assessors in 7 the Assessing Department not to respond to 8 Laurie Ortolano, weren't you telling them they 9 need not make public documents available?</p> <p>10 A No, I was not.</p> <p>11 MS. FEENEY: Object to form. You've 12 already answered it, but I object to form.</p> <p>13 Q Okay.</p> <p>14 A No, I was not.</p> <p>15 Q Okay. Thank you. That's all I have.</p> <p>16 MS. FEENEY: Anybody on the Hollywood 17 Squares lineup want to ask my questions? Going 18 once?</p> <p>19 MS. OSBON: No.</p> <p>20 MS. FEENEY: Going twice?</p> <p>21 MR. CULLEN: Brian Corrigan? (No 22 response.)</p> <p>23 MS. FEENEY: Assuming the witness will be</p>	<p>104</p> <p>1 I have carefully read the foregoing 2 deposition, and the answers made by me are true.</p> <p>3</p> <p>4</p> <p>5 <hr/> KIMBERLY KLEINER</p> <p>6</p> <p>7</p> <p>8 STATE OF _____</p> <p>9 _____, SS.</p> <p>10</p> <p>11 At _____ on the 12 _____ day of _____ A.D. 13 2024, personally appeared the above-named KIMBERLY 14 KLEINER and made oath that the foregoing answers 15 subscribed by her are true.</p> <p>16 Before me,</p> <p>17</p> <p>18</p> <p>19</p> <p>20 <hr/> Notary Public</p> <p>21</p> <p>22</p> <p>23</p>